

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 2:07cr188-TFM
)	
WILLIAM W. CURTIS)	

UNOPPOSED MOTION TO CONTINUE TRIAL

COMES NOW the Defendant, William W. Curtis, by and through the undersigned counsel, Aylia McKee, and pursuant to 18 U.S.C. §§ 3161(h)(1)(I) and (h)(8)(B)(i). Moves this Court to continue the trial in this matter. In support of this Motion, Defendant would show the following:

1. This case is set for trial on the July 21, 2008 trial term.
2. Mr. Curtis has advised the Court that he does not intend to go to trial in this case.
3. Mr. Curtis is currently residing in Illinois. Mr. Curtis will need additional time come up with money for a bus ticket to appear in the Middle District of Alabama for a change of plea hearing.
4. As such, the Defendant would ask that this trial be continued until the next trial term.
5. The Government does not oppose the granting of a continuance.
6. Requests for a continuance of trial are addressed to the sound discretion of the trial court, *United States v. Darby*, 744 F.2d 1508, 1521 (11th Cir. 1984). Additionally, pursuant to 18 U.S.C. §§ 3161(h)(1)(I) and (h)(8)(B)(i), it is in the interest of justice and within the discretion of the trial court to continue this matter to allow the parties to prepare a negotiated plea agreement to be considered by the Court.

WHEREFORE, based upon the foregoing, Mr. Curtis respectfully requests that his case be

continued past the July 21, 2008 trial term.

Dated this 1st day of July, 2008.

Respectfully submitted,

s/ Aylia McKee
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ASB-6178-A39M

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Kent Brunson, Esquire, Assistant United States Attorney and L. Amber Brugnoli, Special Assistant United States Attorney.

Respectfully submitted,

s/ Aylia McKee
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